UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERIA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. S4-4:15CR00404 HEA (NAB)
	)	
VIRGIL SIMS,	)	
	)	
Defendant.	)	

GOVERNMENT'S MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANT SIMS' PRE-TRIAL MOTIONS

COMES NOW the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Michael A. Reilly and Thomas S. Rea, Assistant United States Attorneys for said District, and respectfully requests a thirty-day extension of time to respond to Defendant Virgil Sims' pre-trial motions [Doc ##1778, 1779, 1780, 1781, 1782, 1783, 1784 and 1785]. The Government, in support of its motion, states as follows:

The Government's response to defendant Sims' eight complex pre-trial motions are currently due on October 21, 2018.   Due to the complex nature of this case and the complexity of the issues raised by defendant's numerous motions, considered with the undersigned counsels' pending docket commitments, the United States respectfully requests an extension of thirty days, to November 21, 2018, to respond said motions.

WHEREFORE, the Government respectfully requests a thirty-day extension up to and including

November 21, 2018, to file its response to defendant Sims' pre-trial motions.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

 s/ Michael A. Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Attorney(s) of Record for defendant Sims.

 s/ Michael A. Reilly
MICHAEL A. REILLY, #43908MO
THOMAS S. REA, #53245MO
Assistant United States Attorneys